

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL MCKENZIE, INDIVIDUALLY  
AND DOING BUSINESS AS AMERICAN  
IMAGE ART, AN UNINCORPORATED  
DBA,

Plaintiff,

vs.

ARTISTS RIGHTS SOCIETY, INC., AND  
JANET HICKS,

Defendants.

Case No.: 1:22-cv-01619-MKV

**DEFENDANTS' NOTICE OF MOTION**

PLEASE TAKE NOTICE THAT, upon the Declaration of Scott J. Sholder dated January 23, 2022, and the attached exhibit, and the accompanying Memorandum of Law, dated January 23, 2022, and upon all other pleadings and proceedings had hereto, defendants Artists Rights Society, Inc., and Janet Hicks (collectively, "Defendants"), by their attorneys, Cowan DeBaets, Abrahams & Sheppard LLP, will move this Court at the United States District Court, 500 Pearl Street Courtroom 18C, New York, New York 10007, before the Honorable Mary Kay Vyskocil, on a date and at a time to be designated by the Court, for an order dismissing this case.

Dated: New York, New York  
January 23, 2022

Respectfully submitted,

**COWAN DEBAETS ABRAHAMS  
& SHEPPARD, LLP**

By: /s/ Scott J. Sholder  
Scott J. Sholder, Esq.  
41 Madison Avenue, 38th Floor  
New York, New York 10010  
Telephone: (212) 974-7474  
Fax: (212) 974-8474

*Attorneys for Defendants Artists Rights  
Society, Inc. and Janet Hicks*